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*(additional counsel listed in Exhibit A)*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

## PG&E CORPORATION

- and -

## PACIFIC GAS AND ELECTRIC COMPANY,

## Debtors.

- Affects Both Debtors
- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)  
Chapter 11  
(Jointly Administered)

# PERA'S RESPONSE TO THE COURT'S MEMORANDUM OF MAY 30, 2024

1 Lead Plaintiff Public Employees Retirement Association of New Mexico (“PERA”) hereby  
2 submits this response to the Court’s memorandum of May 30, 2024.

3 The Court requested from PERA “a current count (number of claims, not dollar amounts or  
4 identification of the claimants) that are included in the 33rd Omnibus Objection, including any who  
5 opted to align themselves with PERA in addition to the number of claimants identified on Exhibit A  
6 to the Stipulation Regarding Motion of Lead Plaintiff Pursuant to B.L.R. 90006-1 to Extend Time to  
7 File Response to Certain Claim Objections. (Dkt. 14341-1).”

8 To date, 107 claims have opted to align themselves with PERA:

- 9 • The 82 claims Reorganized Debtors listed in Exhibit A (“Claims to Be Disallowed  
10 and Expunged”) to Reorganized Debtors’ Thirty-Third Securities Omnibus Claims  
11 Objection to PERA and Securities Act Plaintiffs’ TAC, Including to Certain  
12 Claimants that Adopted the TAC (Dkt. 14200);
- 13 • The 21 claims identified on Exhibit A to the Stipulation Regarding Motion of Lead  
14 Plaintiff Pursuant to B.L.R. 9006-1 to Extend Time to File Response to Certain  
15 Claim Objections (Dkt. 14341-1) (the “Stipulation”), with respect to which the  
16 Reorganized Debtors consented; and
- 17 • The 4 claims by securities claimants who have opted to align themselves with PERA  
18 since the Stipulation was filed.

19 In addition, PERA intends to seek discovery from the Reorganized Debtors, and more  
20 particularly the Reorganized Debtors’ claims agent, in connection with PERA’s pending  
21 Bankruptcy Rule 7023 motion as it relates to class certification. Specifically, PERA will be seeking  
22 information concerning those securities claims that were not included in the Reorganized Debtors’  
23 sufficiency objections and that are still pending. Such information is needed in order for PERA to  
24 contact those securities claimants to determine if they are interested in aligning themselves with  
25 PERA and adopting the PERA complaint in connection with merits-based arguments relating to the  
26 sufficiency objections. Obtaining this information is consistent with the Court’s suggestion that  
27 counsel for PERA contact securities claimants to determine if they are interested in joining PERA’s  
28 position. (See February 9, 2024 Transcript of Proceedings (ECF No. 14316) at 29:21-30:10.)

1 Dated: June 21, 2024

Respectfully submitted,

2 **LABATON KELLER SUCHAROW LLP**

3 By: /s/ Michael P. Canty  
4 Michael P. Canty (*pro hac vice*)  
5 *Lead Counsel to Securities*  
*Lead Plaintiff and the Class*

6 - and -

7 **MICHELSON LAW GROUP**

8 *Local Bankruptcy Counsel to Securities Lead*  
*Plaintiff and the Class*

9 - and -

10 **LOWENSTEIN SANDLER LLP**

11 *Special Bankruptcy Counsel to Securities Lead*  
*Plaintiff and the Class*

12 - and -

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14 *Liaison Counsel for the Class*

15 - and -

16 **ROBBINS GELLER RUDMAN & DOWD LLP**

17 *Counsel for the Securities Act Plaintiffs*

18 - and -

19 **VANOEVERBEKE, MICHAUD & TIMMONY, P.C.**

20 *Additional Counsel for the Securities Act Plaintiffs*

## **EXHIBIT A**

## COUNSEL

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